

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

IN RE GERBER PRODUCTS COMPANY :	Master File No. 1:21-cv-00269
HEAVY METALS BABY FOOD :	
LITIGATION :	Class Action
:	
THIS DOCUMENT RELATES TO :	
ALL ACTIONS :	
:	

**JOINT AGENDA FOR JULY 8, 2022 CONFERENCE**

Pursuant to Case Management Order No. 2 (“CMO No. 2”) (ECF No. 113), Plaintiffs Deandra Bryant, Christopher Craig, Mayra Verduzco, Renee Bryan, Jennifer Gaetan, Vanessa Inoa, Charlotte Willoughby, Angelique Velez, Danielle Visconti, Jessica Moore, and Janice Wilson (“Plaintiffs”) and Defendant Gerber Products Company (“Defendant” or “Gerber”) (together, the “Parties”) hereby submit this Joint Agenda for the July 8, 2022 Status Conference and Rule 16(b) Conference. As stated by the Court in CMO #2, the Parties will be prepared to discuss scheduling, discovery and case management issues. In addition, the Parties will be prepared to discuss Plaintiffs’ motion for additional non-party, non-expert depositions (ECF No. 118).

The only other agenda items the Parties have identified is the following:

In CMO No. 2, the Court discussed a joint “Document Depository.” The Parties have met and conferred and respectfully submit that due to work product concerns associated with a shared Document Depository, they would prefer to maintain their own separate such Depositories, each side to bear its own costs. *See* Stipulation and Order Regarding Discovery of Electronically Stored Information, at paragraph 4 (ECF No. 120, pageID#1613).

Dated: June 24, 2022

By: /s/ Steven J. Toll  
Steven J. Toll  
COHEN MILSTEIN SELLERS &  
TOLL, PLLC  
1100 New York Ave. NW  
East Tower, 5th Floor  
Washington, DC 20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408-4699  
[stoll@cohenmilstein.com](mailto:stoll@cohenmilstein.com)

Rosemary M. Rivas  
GIBBS LAW GROUP LLP  
1111 Broadway, Suite 2100  
Oakland, CA 94607  
Telephone: 510-350-9700  
Facsimile: 510-350-9701  
[rmr@classlawgroup.com](mailto:rmr@classlawgroup.com)

Janine Pollack  
CALCATERRA POLLACK LLP  
1140 Avenue of the Americas, 9th Floor  
New York, New York 10036  
Telephone: 212-899-1765  
Facsimile: 332-206-2073  
[jpollack@calcaterrapollack.com](mailto:jpollack@calcaterrapollack.com)

*Plaintiffs' Interim Co-Lead Counsel*

Dated: June 24, 2022

By: /s/ Bryan A. Merryman  
Bryan A. Merryman  
(admitted *pro hac vice*)  
WHITE & CASE LLP  
555 South Flower Street, Suite 2700  
Los Angeles, CA 90071  
Tel: (213) 620-7700  
Fax: (213) 452-2329  
[bmerryman@whitecase.com](mailto:bmerryman@whitecase.com)

Kathryn J. Mims  
WHITE & CASE LLP  
701 Thirteenth Street, NW  
Washington, D.C. 20005  
Tel: (202) 626-3200  
Fax: (202) 639-9355  
[kathryn.mims@whitecase.com](mailto:kathryn.mims@whitecase.com)

Geoffrey W. Castello  
KELLEY DRYE & WARREN LLP  
One Jefferson Road, 2nd Floor  
Parsippany, NJ 07054  
Tel: (973) 503-5922  
Fax: (973) 503-5950  
[gcastello@kelleydrye.com](mailto:gcastello@kelleydrye.com)

*Counsel for Defendant  
Gerber Products Company*